

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON

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the Clerk's Office at Charleston on

JUL 21 2009

TERESA L. DEPPNER, CLERK
U.S. District Court
Southern District of West Virginia

UNITED STATES OF AMERICA

v.

CRIMINAL NO.

2:09-00173
18 U.S.C. § 665(a)
18 U.S.C. § 1028A
18 U.S.C. § 2

MARTIN ROBINSON BOWLING

I N F O R M A T I O N

The United States Attorney Charges:

COUNT ONE

(Embezzlement Of Employment and Training Funds)

1. At all relevant times, defendant MARTIN ROBINSON BOWLING was an agent and employee of, and connected with an organization receiving financial assistance and funds under title I of the Workforce Investment Act of 1998.

2. From March 2008 until at least April 2009, defendant MARTIN ROBINSON BOWLING, aided and abetted by others known and unknown to the United States Attorney, knowingly embezzled, willfully misapplied, stole, and obtained by fraud moneys, funds, assets, and property which were the subject of a contract pursuant to title I of the Workforce Investment Act of 1998, in an amount in excess of \$1,000.

In violation of Title 18, United States Code, Sections 665(a) and 2.

COUNT TWO
(Aggravated Identity Theft)

1. From at least December 2006 through July 2007, at or near Cross Lanes, West Virginia, defendant MARTIN ROBINSON BOWLING knowingly devised a scheme to defraud and artifice to defraud persons known to the United States Attorney, including certain subscribers of *Woodcrafter's Magazine*, of money and property, by using their credit card account numbers and other personal identifying information to make unauthorized purchases over the Internet.

2. It was the purpose of the scheme to defraud the known persons and for defendant MARTIN ROBINSON BOWLING to enrich himself by accessing the Internet from his residence and place of business, that is, COMAR, Inc., both of which are situated in Cross Lanes, Kanawha County, West Virginia, to make unauthorized online purchases totaling approximately \$4,500.

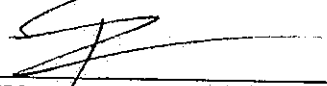
3. Among other instances, on or about June 19, 2007, at or near Cross Lanes, Kanawha County, West Virginia, and within the Southern District of West Virginia and elsewhere, defendant MARTIN ROBINSON BOWLING did knowingly possess and use, without lawful authority, the means of identification of a person known to the United States Attorney, during and in relation to violations of 18 U.S.C. §§ 1029, and 1343, that is, access device and wire fraud, by fraudulently and without authorization using the means of identification of the known person, including credit card account

number and personal identifying information, to order via the Internet ten pieces of art totaling \$925.66 from "Art.com," a company situated in or near Emeryville, California.

In violation of Title 18, United States Code, Section 1028A.

CHARLES T. MILLER
United States Attorney

By:


THOMAS C. RYAN
Assistant United States Attorney